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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

JINJU ZHANG, an individual;

Plaintiff,

vs.

BENLIN YUAN, an individual; HONG LIN,
an individual; CAMIWELL, INC., a California
corporation; CAMIWELL, INC. (CANADA),
a Canadian corporation; BEJING ASIACOM
INFORMATION TECHNOLOGY CO., LTD.,
a Chinese corporation; ASIACOM
AMERICAS, INC., a Virginia corporation;
BANK OF AMERICA CORPORATION, a
National Association; and DOES 1 to 20,
inclusive,

Defendants.

Case No.: 3:23-cv-05818-CRB

**DECLARATION OF JINJU ZHANG IN
SUPPORT OF PLAINTIFF'S OPPOSITION
TO CAMIWELL CANADA'S MOTION TO
DISMISS FIRST AMENDED COMPLAINT**

Date: August 15, 2024

Time: 10:00 a.m.

Judge: Hon. Vince Chhabria

Courtroom: 4 – 17th Floor

AND RELATED CROSS-ACTIONS

I, Jinju Zhang, declare:

1. I am the plaintiff and counter-defendant in the above-captioned litigation.
2. I have personal knowledge of the matters contained in this declaration and, if called upon, could and would competently testify thereto.

DECLARATION OF JINJU ZHANG IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO CAMIWELL CANADA'S MOTION TO DISMISS FIRST AMENDED COMPLAINT

1 3. I make this declaration in support of Plaintiff's opposition to the motion to dismiss filed by
2 Defendant Camiwell Canada.

3 4. As CEO of Camiwell Canada, Defendant Benlin Yuan (Yuan) managed all projects and sent out
4 emails to his employees directing them to work in California.

5 5. On a systematic and quarterly basis, Yuan and his employees traveled to California for work
6 and lived in Plaintiff's house in San Jose, California.

7 6. As CEO of Camiwell Canada, he actively directed Camiwell U.S. to commit tax fraud by
8 sending out fake invoices for services for consulting services that were never rendered and asked
9 Camiwell U.S. to pay shareholder dividends to him in the guise of consultant fees.

10 7. Appended as **Exhibit 1** to the accompanying Declaration of Dennis Chin are true and correct
11 copies of fake invoices for consulting services that were never rendered from Camiwell Canada to
12 Camiwell U.S.

13 8. Appended as **Exhibit 2** to the accompanying Declaration of Dennis Chin are true and correct
14 copies of invoices from Camiwell Canada to Beijing Asiacom that were produced in Summer 2023.

15 I declare under penalty of perjury under the laws of the State of California that the foregoing is
16 true and correct, and that this declaration was executed on July 25, 2024, at Conroe, Texas.

17 

18 _____
Jinju Zhang